

Message

From: Dwight Dotterer -MDA- [dwight.dotterer@maryland.gov]
Sent: 2/10/2015 9:52:26 PM
To: Zolandz, Mark [Zolandz.Mark@epa.gov]
CC: Gary Kelman -MDE- [gary.kelman@maryland.gov]
Subject: Re: Comments to the report

Mark,

Louise reviewed the report again and said it looks good. Thank you for giving us the opportunity to review the draft copy.

Dwight

On Tue, Feb 10, 2015 at 11:40 AM, Zolandz, Mark <Zolandz.Mark@epa.gov> wrote:

Dwight,

Thanks for checking and letting me know. I went to the regs, which state that "A consultant or certified farm operator shall consider the following when making recommendations on nutrient application methods in a plan: (4) Measures to minimize or control nutrient movement to sensitive areas, including natural or existing wetlands, sinkholes, and steep slopes;" While the regulations could be clarified to address karst features beyond only sinkholes, I think that Maryland's attempt to address this concern makes it unnecessary to call out Karst geography in the Little Antietam Creek assessment report.

Attached is an updated version of the report. Can you have Louise read through and see that her concerns were addressed? I accepted all of her changes and have redlined my changes to her suggestions, plus a few other minor edits.

Thanks for having her check it over and getting back to me.

Mark Zolandz

U.S. Environmental Protection Agency, Region III

NPDES Enforcement Branch , Water Protection Division

1650 Arch Street (3WP42)

Philadelphia, PA 19103-2029

Tel: 215-814-2319

From: Dwight Dotterer -MDA- [mailto:dwight.dotterer@maryland.gov]
Sent: Tuesday, February 10, 2015 9:49 AM
To: Zolandz, Mark
Cc: Gary Kelman -MDE-
Subject: Re: Comments to the report

Mark,

Louise thought Karst was specifically mentioned, but apparently it was left out. The reference our program is finding is 15.20.086(4) which mentions management concerns including sinkholes which is an indirect reference. I don't believe we have addressed Karst by name. Sorry for the confusion. I remember seeing a CAFO NMP several years ago that specifically located at least one sinkhole on the farm and advised the farmer to avoid it and provide a buffer around it, but that would have been the good sense of an above average Plan writer. But any real direction for farming in a Karst area is not provided.

Thanks,

Dwight

On Fri, Feb 6, 2015 at 4:06 PM, Zolandz, Mark <Zolandz.Mark@epa.gov> wrote:

Dwight,

No problem, thanks for getting them to us so that the report is accurate. Looking through the comments, I had one question: could you send me a reference or link to where MD's nutrient management regulations address karst geology?

Thanks, and have a great weekend.

Mark Zolandz

U.S. Environmental Protection Agency, Region III

NPDES Enforcement Branch , Water Protection Division

1650 Arch Street (3WP42)

Philadelphia, PA 19103-2029

Tel: 215-814-2319

From: Dwight Dotterer -MDA- [mailto:dwight.dotterer@maryland.gov]

Sent: Friday, February 06, 2015 10:46 AM

To: Zolandz, Mark

Cc: Gary Kelman -MDE-

Subject: Comments to the report

Mark,

Louise Lawrence from our office has also reviewed the report and has noted a few minor changes listed on the margin that you may want to consider. Sorry for not getting them to you sooner.

Thanks,

Dwight